

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

_____	:	
FISHER-PRICE, INC. and	:	
MATTEL, INC.,	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	C.A. No. 17-51-LPS-CJB
	:	
DYNACRAFT BSC, INC.,	:	
	:	
Defendant.	:	
_____	:	

**DEFENDANT DYNACRAFT BSC, INC.'S
MOTION TO DISMISS FOR IMPROPER VENUE**

Defendant Dynacraft BSC, Inc., by and through its undersigned counsel, hereby respectfully moves the Court to dismiss this action in its entirety for improper venue pursuant to Federal Rule of Civil Procedure 12(b)(3) or, in the alternative, to transfer the case to the United States District Court for the Northern District of California pursuant to 28 U.S.C. § 1406(a).

The grounds for this motion are fully set forth in the accompanying opening brief, filed contemporaneously herewith and incorporated by reference herein.

Dated: June 5, 2017

Respectfully submitted,

/s/ John C. Phillips, Jr.

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